

AO 91 (Rev. 08/09) Criminal Complaint

United States Courts
Southern District of Texas
FILED

October 25, 2024

Nathan Ochsner, Clerk of Court

United States of America

v.

TRACION DESHON JAMES

Defendant(s)

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Case No. 24-8537-WM

4:24-mj-472

FILED BY SW D.C.
Oct 17, 2024
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - WPB

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 16, 2024 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2113(a)
18 U.S.C. §§ 2113(b)

Offense Description

Bank Robbery
Bank Larceny

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Zachary F. Schleiffer, FBI
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Telephone (Facetime)

Date: 10/17/2024


Judge's signature

City and state: West Palm Beach, Florida

William Matthewman United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Zachary F. Schleiffer, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND JURISDICTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and I have been so employed since September of 2021. I am currently assigned to PB-2, the Violent Crimes and Major Offender Squad of the Palm Beach County Resident Agency, which investigates bank robberies, narcotics trafficking, fugitives, firearms offenses, gang activity, and other violent crimes. Prior to joining PB-2, I was assigned to the health care fraud squad of the FBI's Palm Beach County Resident Agency for 2 years. Based on my experience as a federal law enforcement officer, I have also conducted criminal investigations involving or relating to sophisticated financial schemes, including identity theft, wire fraud, mail fraud, bank fraud, money laundering, and access device fraud.

2. Pursuant to 18 U.S.C. § 3052, I am authorized to apply for and execute search warrants and arrest warrants for offenses enumerated in Titles 18 and 21 of the United States Code. I have participated in and directed investigations involving violent crime, violations of the Hobbs Act, bank robberies, trafficking in controlled substances, firearms offenses, identity theft, wire fraud, mail fraud, bank fraud, and various types of fraud committed using stolen identities. As a result of my training and experience, I am familiar with the tactics, methods, and techniques of committing those crimes.

3. I make this affidavit in support of an application for a criminal complaint charging TRACION DESHON JAMES, herein referred to as "JAMES," with a violation of 18 U.S.C. § 2113(a), the taking or attempted taking by force, intimidation, or extortion, of any property, money or any other thing of value belonging to, or in the care, custody, control, management or possession of any bank, credit union, or savings and loan association, and with a violation of 18 U.S.C. § 2113(b), which makes it a crime to take and carry away, with intent to steal or purloin, any property or money or any other thing of value exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of any bank, credit union, or savings and loan association.

4. This affidavit is based upon my own personal knowledge of the facts and circumstances surrounding the investigation and information provided to me by other law enforcement officers. I have not included in this affidavit each and every fact known to me about the matters set forth herein, but only those facts and circumstances that I believe are sufficient to establish probable cause for this Court to authorize a search warrant for the seizure of records.

5. Based upon my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, Section 2113(a) the taking or attempted taking by force, intimidation, or extortion, of any property, money or any other thing of value belonging to, or in the care, custody, control, management or possession of any bank, credit union, or savings and loan association), and Title 18, United States Code, Section 2113(c) (knowingly receive, possess, conceal, store, barter, sell or dispose of any property, money, or any thing of value which has been taken or stolen from a bank, credit union, or savings and loan association).

BACKGROUND CONCERNING INVESTIGATION

6. On October 16, 2024, the FBI and local law enforcement were alerted to a robbery that occurred at Wells Fargo Bank, located at 1615 Palm Beach Lakes Blvd, West Palm Beach, Florida 33401. Law enforcement arrived and made contact with Victim 1 (V1), a service technician working on the ATM machine at Wells Fargo Bank. V1 told law enforcement that he received a page from his employer to fix a jammed ATM at the aforementioned location. When V1 opened the machine, two masked men, JAMES and one unknown coconspirator (Subject 2) shoved V1 and told him to "get out of the way." JAMES and Subject 2 proceeded to take five cassettes from the ATM which totaled \$219,714.

PROBABLE CAUSE

7. Law enforcement obtained surveillance footage from the bank and identified a White Chevy Blazer that JAMES and Subject 2 left the scene in. JAMES and Subject 2 then drove to the Forum Shopping Center and disposed of clothing that was worn during the robbery. JAMES and Subject 2 entered different businesses and paid for an item using \$20 of US currency.

8. Shortly after removing the clothing used in the robbery, JAMES and Subject 2 entered an

Uber and left the Forum Shopping Center. Law enforcement obtained additional surveillance footage from the shopping center and subsequently identified the license plate of the Uber, a grey KIA FL Tag: GWKZ77. Law enforcement made contact with the driver who dropped JAMES and Subject 2 off at a Motel 6 on Blue Heron Blvd and stated that JAMES and Subject 2 were wearing white shirts with no sleeves.

9. Law enforcement reviewed surveillance footage from the Motel 6 and staff identified room 245 as the room rented by JAMES. JAMES provided his Texas ID, with his name and photograph, upon check in. Surveillance footage showed that JAMES and Subject 2 entered and exited room 245 throughout the afternoon. JAMES and Subject 2 eventually departed with a black backpack. The black backpack was consistent with a black backpack observed in surveillance footage from both Wells Fargo and the Forum Shopping Center.

10. Clothing recovered from the Forum Shopping Center and Motel 6 were consistent with the clothing worn by JAMES and Subject 2 observed in the surveillance footage from Wells Fargo Bank.

11. The White Chevy Trail Blazer used to flee the scene of the Wells Fargo Bank was seized as evidence and transported back to West Palm Beach Police Department. Crime Scene Investigators conducted an inventory of the vehicle and found a large sum of US currency from inside the vehicle along with five empty cassettes consistent with the ones stolen from the ATM at the Wells Fargo Bank.

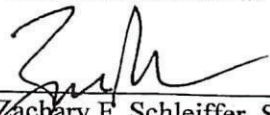
12. On October 17, 2024, Law Enforcement made contact with Witness 1 (W1). W1 was hired to drive JAMES and Subject 2 to Houston, Texas. JAMES contacted W1 using a mobile phone 346-375-4817 and ordered a car service. W1 picked up JAMES and Subject 2 from the aforementioned motel in Riviera Beach, FL and drove JAMES and Subject 2 to Houston, Texas. W1 identified JAMES by his street name, "Fat," which was documented in law enforcement databases.

CONCLUSION

1. Based upon the information contained in this affidavit, I believe that probable cause exists that TRACION DESHON PAGE committed a violation of Title 18, United States Code, Section 2113(a) the taking or attempted taking by force, intimidation, or extortion, of any property, money or any other

thing of value belonging to, or in the care, custody, control, management or possession of any bank, credit union, or savings and loan association), and Title 18, United States Code, Section 2113(b) (take and carry away, with intent to steal or purloin, any property or money or any other thing of value exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of any bank, credit union, or savings and loan association.).

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Zachary F. Schleiffer, Special Agent
Federal Bureau of Investigation

Sworn and Attested to before me by Applicant by Telephone (Facetime)
pursuant to Fed. R. Crim. P. 4(d) and 4.1 this 17th day of October, 2024.


HONORABLE WILLIAM MATTHEWMAN
UNITED STATES MAGISTRATE JUDGE

12251-504

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-8537-WM

UNITED STATES OF AMERICA

vs.

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CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **NO**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **NO**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **NO**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **NO**

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By:

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